

EXHIBIT 16

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

Case No. 1:17 cv 00129; 1:17 cv 00256

RICHARD L. CAMPBELL,)
)
Plaintiff,)
)
v.)
)
SHIRLEY TETER and SINCLAIR)
COMMUNICATIONS, LLC,)
)
Defendants.)
)

SHIRLEY TETER,)
)
Plaintiff,)
)
v.)
)
PROJECT VERITAS ACTION FUND,)
PROJECT VERITAS, and JAMES E.)
O'KEEFE, III,)
)
Defendants.)
_____)

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

VIDEO DEPOSITION OF RUTH C. SMITH

Taken by Plaintiff/Defendant/Counter-Plaintiff

Asheville, North Carolina

Friday, November 30th, 2018

Reported in Stenotype by
Tammera R. Thomason, Certified Shorthand Reporter
Transcript produced by computer-aided transcription

1 **A. It would have been around the spring of 2017.**

2 Q. Before or after your interaction with Pete
3 Kaliner, Kaliner?

4 **A. Oh, I'm sorry. I thought that was a question.**
5 **It was after.**

6 Q. For each of these media outlets that we've
7 discussed, did you reach out to them, or did they reach
8 out to you or was it a mix?

9 **A. It was a mix.**

10 Q. For WLOS, did you reach out to them or did they
11 reach out to you?

12 **A. They reached out to us.**

13 Q. For the Asheville Citizen Times, did you reach
14 out to them or did they reach out to you?

15 **A. I don't remember.**

16 Q. For the Charleston Post and Courier, did you
17 reach out to them or did they reach out to you?

18 **A. I reached out to them.**

19 Q. When was it that you reached out to them?

20 **A. September -- I don't remember the exact date.**
21 **It would have been probably the 15th or the 16th.**

22 Q. Why did you reach out to the Charleston Post and
23 Courier?

24 **A. The Charleston Post and Courier was my client's**
25 **hometown newspaper, and they had run an article with Ms.**

1 **Teter's accusations in it.**

2 Q. And you don't recall who you spoke with, but you
3 did speak with someone from the Charleston Post and
4 Courier?

5 **A. That is correct.**

6 Q. And what was your goal in speaking with that
7 person?

8 **A. To tell the truth.**

9 Q. Do you recall anything about your conversation
10 with the Charleston Post and Courier?

11 **A. I believe I told him that there was video**
12 **evidence contradicting Ms. Teter's allegations, as well**
13 **as physical evidence contradicting her allegations. I**
14 **provided them a copy of our press release.**

15 Q. And I think we'll look at that in a minute, but
16 the press release to which you're referring is the same
17 press release that was provided to Breitbart?

18 **A. Correct.**

19 Q. How many times did you speak with the Charleston
20 Post and Courier?

21 **A. One.**

22 Q. Did 570 AM reach out to you, or did you reach
23 out to them?

24 **A. They reached out to me.**

25 Q. Did Breitbart reach out to you, or did you reach